

EXHIBIT 3

Jon King

From: Boehning, Christopher <cboehning@paulweiss.com>
Sent: Tuesday, June 02, 2015 6:44 AM
To: Jon King
Cc: Steve Berman; Daniel Levi; Bruce Birenboim
Subject: RE: Mehr v. FIFA et al. - DOJ Materials

Jon:

We cannot consent to and will oppose any motion to file the DOJ's recent Indictment (and related criminal Informations) regarding current and former soccer and marketing executives. These materials are wholly irrelevant to the litigation, and filing them would be an obvious ploy to prejudice the Court and distract it from the numerous and obvious infirmities in the Complaint.

As you know, FIFA itself has not been indicted. Rather certain current and former soccer executives (none is an employee of FIFA) of various other entities, as well as executives of several marketing companies, were indicted. The conduct described in those indictments has no connection whatsoever to the issues raised in this matter, including the question whether Plaintiffs have met their burden to establish specific personal jurisdiction over FIFA. Mr. Berman conceded at oral argument that Plaintiffs do not contend that FIFA is subject to general jurisdiction in California. To establish specific jurisdiction, Plaintiffs would have to show that their claims would not have arisen but for FIFA's contacts with California. The indictments, which are of no evidentiary value in any event, offer nothing on this point. Indeed, given that your case concerns the risk of concussions in youth soccer, it is inconceivable that you could craft an argument connecting the conduct described in the indictments with the causes of action in the Complaint.

Likewise, it is inconceivable that you could connect the indictments to the arguments made in the motion to dismiss regarding joinder of IFAB. Again, there is simply nothing in the indictments that relates in any way to Laws of the Game as promulgated by IFAB and as implemented (or not implemented, as the case may be), in the various youth soccer leagues in California.

As noted above, we believe any attempt to interject these indictments in our case is highly inappropriate. For these reasons, we cannot consent and will, if you proceed, oppose your motion. We ask that you reconsider making such an application and that you do so mindful of your obligations under the Federal Rules. We reserve the right to seek costs and sanctions, given the patent irrelevance to this action of the conduct that is the subject of the DOJ's actions.

I am available to discuss if you have questions.

Best,

Chris

Christopher Boehning | Partner
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From: Jon King [<mailto:jonk@hbsslaw.com>]
Sent: Monday, June 01, 2015 3:41 PM
To: Boehning, Christopher
Cc: Steve Berman; Levi, Daniel H
Subject: RE: Mehr v. FIFA et al. - DOJ Materials

Ok thanks Chris.

-Jon

Jon King | **Hagens Berman Sobol Shapiro LLP** | Direct: (510) 725-3034

From: Boehning, Christopher [<mailto:cboehning@paulweiss.com>]
Sent: Monday, June 01, 2015 12:39 PM
To: Jon King
Cc: Steve Berman; Daniel Levi
Subject: RE: Mehr v. FIFA et al. - DOJ Materials

Jon,

I'm overseas on business. We will respond tomorrow.

Best,

Chris

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From: Jon King [<mailto:jonk@hbsslaw.com>]
Sent: Monday, June 01, 2015 3:25 PM
To: Boehning, Christopher
Cc: Steve Berman
Subject: Mehr v. FIFA et al. - DOJ Materials

Chris –

We intend to file an administrative motion requesting leave to file the United States Department of Justice's ("DOJ") recent Indictment and various criminal Informations regarding numerous current and former FIFA executives. We believe that the Indictment and criminal Informations, and related statements from governmental officials, provide information relevant to the pending jurisdiction, Fed. R. Civ. P. joinder, and complaint amendment issues.

Please let us know whether FIFA consents to the relief that we seek. Given that the Court is currently evaluating the motions to dismiss, we intend to file **tomorrow (Tuesday) at noon Pacific**.

Thank You,

Jon

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